

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MARIO PILLCO MOROCHO, ABDOULAYE FALL, DARLIN GUILLERMO, JUAN CARLOS ILLICACHI SHIGLA, DIEGO AMADOR GALINDO, SEGUNDO FABIAN ARMIJOS, DIEGO GUALLÁN TIXI, MIGUEL LUCAS IXCUNA YAX, LLOYD WAFULA, CONROY DESMOND LEWIS, CARLOS MENJIVAR, NUELSON GOMES, FLAVIO ANDRADE PRADO JUNIOR, JANITO DE CARVALHO, JOAO FERNANDES, AIRES DA GRACA, and MARCO BATTISTOTTI,

*Plaintiffs,*

Case No.: 1:22-cv-10652-MPK

BRISTOL COUNTY SHERIFF'S OFFICE; and THOMAS HODGSON, STEVEN SOUZA, BRUCE ASSAD, JOSEPH OLIVER III, BARRY FERREIRA, PAUL DOUGLAS, JOSHUA DUBE, JOSHUA SYLVIA, DOUGLAS MONGEON, JONATHAN ALLARD, CHRISTOPHER GONCALVES, NELSON CABRAL, MICHAEL GONCALVES, MOISES ISIDORO, TIMOTHY MELO, KENNETH ALMEIDA, WILLIAM DILLINGHAM, MATTHEW BOYER, ANDREW SOUSA, GARRETT CORREIA, MARK AMARAL, RYAN ISHERWOOD, CHARLES GRISWOLD, NOLAN REARDON, JENNIFER PICARD, and JUDITH BORGES, all in their individual capacities,

*Defendants.*

**DECLARATION OF ELENA PLENEFISCH**  
**IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT**

I, Elena Plenefisch, hereby state as follows:

1. I am counsel for Plaintiffs in the above-captioned matter. I make this declaration on my personal knowledge.

2. On May 9, 2025, Plaintiffs filed with leave of Court their Second Amended Complaint, which names Defendants Jonathan **ALLARD**, Kenneth **ALMEIDA**, Mark Rodi (**AMARAL**), Bruce **ASSAD**, Judith **BORGES**, Matthew **BOYER**, Nelson **CABRAL**, Garrett **CORREIA**, William **DILLINGHAM**, Paul **DOUGLAS**, Joshua **DUBE**, Barry **FERREIRA**, Christopher **GONCALVES**, Michael **GONCALVES**, Charles **GRISWOLD**, Moses **ISIDORO**, Ryan **ISHERWOOD**, Timothy **MELO**, Douglas **MONGEON**, Joseph **OLIVER III**, Jennifer **PICARD**, Nolan **REARDON**, Andrew **SOUSA**, and Joshua **SYLVIA** (collectively, “New Defendants”). *See* ECFs 158, 159.

3. William Breen, counsel for the New Defendants, subsequently agreed to accept service via email on his clients’ behalf.

4. On Friday, May 16, 2025, Plaintiffs properly served each New Defendant via email to Mr. Breen and the representative of the Bristol County Sheriff’s Office, Edward Meyers. *See* ECF 161 (Affidavit of Service).

5. Attached hereto as Exhibit A is a correct and true copy of the email served upon Mr. Breen and Mr. Meyers on May 16, 2025.

6. Previously named Defendants Bristol County Sheriff’s Office, Thomas Hodgson, and Steven Souza were served on May 9, 2025, via CM/ECF service on their counsel of record.

Signed and sworn to under the penalties of perjury this 10<sup>th</sup> day of June, 2025.

/s/ Elena Plenefisch  
Elena Plenefisch

**CERTIFICATE OF SERVICE**

I, Elena Plenefisch, hereby certify that on June 10, 2025, I caused a true and accurate copy of the forgoing to be served on counsel of record by CM/ECF.

/s/ Elena Plenefisch  
Elena Plenefisch